

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

CHERYL PAYNE,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	
)	FILE NO. 1:11-CV-2208 JEC
McCULLOUGH, PAYNE & HAAN, LLC,)	
ZENITH ACQUISITION CORP., and)	
NORTH STAR CAPITAL)	
ACQUISITIONS, LLC,)	
)	
Defendants.)	

NOTICE OF ISSUANCE OF SUBPOENA TO CITIBANK N.A.

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Defendants McCullough, Payne & Haan, LLC and Zenith Acquisition Corp., by counsel, have issued a Subpoena to Citibank, N.A. for the production of documents on Monday, October 10, 2011, at 10:00 a.m.

Respectfully submitted this the 28th day of September, 2011.

HAWKINS PARNELL
THACKSTON & YOUNG LLP

/s/ M. Elizabeth O'Neill
M. Elizabeth O'Neill
Georgia Bar No. 058163
Counsel for Defendants

4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308-3243
Telephone: (404) 614-7400
Telecopier: (404) 614-7500
E-mail: honeill@hplegal.com

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LOCAL RULE 5.4A AND LOCAL RULE 26.3A CERTIFICATE

COMES NOW McCullough, Payne & Haan, LLC and Zenith Acquisition Corp., Defendants in the above-styled action, by and through their counsel of record, and, pursuant to LR 5.4A, NDGa, and LR 26.3A, NDGa, certifies that it has this day served upon all counsel **NOTICE OF ISSUANCE OF SUBPOENA TO CITIBANK, N.A. WITH EXHIBIT**, by depositing the same in an envelope with proper postage affixed thereto and addressed as follows:

Craig J. Ehrlich
Weisberg & Meyers, LLC
5025 N. Central Ave. #602
Phoenix, Arizona 85012

This the 28th day of September, 2011.

HAWKINS PARNELL
THACKSTON & YOUNG LLP

/s/ M. Elizabeth O'Neill
M. Elizabeth O'Neill
Georgia Bar No. 058163
Counsel for Defendants

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